

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA)	
)	
)	
v.)	Case no. 1:14-CR-306-GBL - 8
)	
)	
MANUEL E. PAIZ GUEVARA)	

MOTION FOR LEAVE TO FILE EX PARTE PLEADING

COMES NOW, MANUEL E. PAIZ GUEVARA and files this, his Motion for Leave to File Pleadings Ex Parte. In support of the motion the defendant would allege and prove the following:

1. The pleading to be filed addresses the services and rates of compensation for assistance in the preparation and presentation of the defense case.
2. That the revelation of the name and identity of the person and the rate of compensation would and could reveal defense strategy, attorney client information and possibly impede effective assistance of counsel.
3. That the interests of the United States nor any co-defendant will be effected by the matter being discussed and the rate of compensation sought.

WHEREFORE, premises considered, defendant moves for leave to file pleadings ex parte involving the rate of compensation for retention of defense assistance during the preparation and presentation of this case.

Respectfully submitted,

MANUEL ERNESTO PAIZ GUEVARA

By: _____(s)_____

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September _____, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will then send electronic notification of such filing (NEF) to all counsel on the case.

_____/S/_____
David P. Baugh, Esq.
Attorney for Defendant
Manuel E. Paiz Guevara